## **Comments - Environmental Project Review** Maine Department of Inland Fisheries and Wildlife **Inland Fisheries and Wildlife Division Comments** Region D Applicant's Name: Canton Mountain Wind LLC Project #:L-25557-24-A-N & L-25558-TB-B-N Regulatory Agency: MDEP Project Type: 22MW Wind Energy Project Project Manager: Erle Townsend Date Comments Sent: December 6, 2012 Comments Due Date: **Project Location** Town: Canton County: Oxford Waterbody: Wildlife Biologist(s): Cordes, Walker

We have reviewed additional radar study results as performed on Colonel Holman Mountain during the spring and fall migration seasons of 2012. Due to the proximity and similarity of Colonel Holman Mountain to the proposed Canton Mountain project site our Department recommended that a second year of radar studies performed on the Colonel Mountain ridge could serve as a supplemental dataset evaluating avian and bat migration for the Canton Mountain Wind Project. Additionally, we have reviewed the Paul Kerlinger report "Risk Assessment for Night Migrating Birds at the Canton Mountain Wind Power Project, Maine" as submitted by Patriot Renewables in September.

We are satisfied that adequate radar data has been collected for our project review purposes. However, we remain concerned given the relatively high percentage of migrants recorded within the proposed rotor swept zone. Percentages calculated based on two years of data are relatively high compared to other wind power projects for which similar radar data has been collected in Maine. We do not feel that these percentages alone warrant project design modifications, but underscore the importance of operational curtailment as previously recommended by our Department. To re-iterate recommendations submitted in March of 2012, MDIFW recommends that operational control measures be established for the Canton Mountain Wind Facility that set the turbine cut-in speed to 5.0 m/s starting at one-half hour before sunset to one-half hour after sunrise and be employed from April 20<sup>th</sup> through October 15<sup>th</sup>. During this time frame when the wind speed is less than the 5.0 m/s threshold, turbine blades are not allowed to rotate thus significantly reducing bat mortality risk. If at any point during this time period the wind speed increases to > 5.0 m/s the turbine blades are free to rotate. These curtailment measures are intended to be in place from day one of operation for the life of the project. They are not intended to be reactionary mitigation triggered by some threshold based on pre or postconstruction studies. These measures will not only minimize bat mortality, but also help to minimize mortality of nocturnal migrating birds passing through the rotor swept zone.